

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

FILED IN CHARLESTON
U.S. BANKRUPTCY COURT

IN RE:

DONALD PAUL SMITH

Case NO.:05-22051
Chapter 11

DEC 02 2009

SOUTHERN DISTRICT
WEST VIRGINIA

THOMAS FLUHARTY,
TRUSTEE,

Plaintiff,

v.

AP Case No.:4:09-AP-09-02057

JUDITH SMITH and
JACLYN SMITH TILLMAN

Defendants.

ANSWER

Jaclyn Smith (formally Jaclyn Smith Tillman) and Judith Smith answer the complaint as the following:

1. Legal issue I have no knowledge
2. Legal issue I have no knowledge
3. Confirm the contents.
4. Confirm the contents.
5. Denied the contents.
6. Confirm the contents.
7. Confirm the quitclaim deed of Donald Smith half only to Jaclyn Smith
Denied Judith Smith quitclaim deed she already owned half of the property
Denied the dates, have no knowledge of the dates recorded.
8. Denied the contents
9. Confirm the contents
10. Confirm the contents
11. Confirm the sale of the property to Rusty Hyneman.
Denied. RPM was a race horse

12. Confirm the horse death.
Denied: RPM was a race horse

13. Confirm the contents

14. Confirm Jaclyn Smith purchased 45.17 acres from Dwayne Sullivan.
Denied the rest of the paragraph. Jaclyn smith has two loans on the property to Heritage South Community Credit Union and First National Bank of Pulaski. Will provide copies if requested.

15. Denied the contents

16. Denied the contents.

17. Denied the contents

18. Denied the contents

19. Denied the contents.

20. Denied the contents

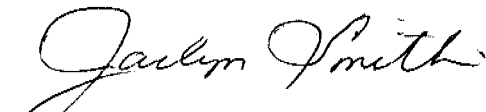
21. Denied the contents

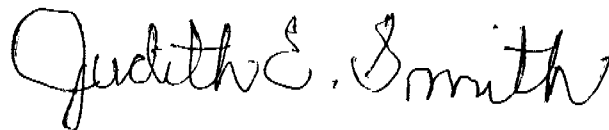
22. Denied the contents

23. Question the Statue of Limitations on this matter due to the long length of time that had passed before the claim.

24. Request a change in venue. The matter should be held in the state of Tennessee, where the property in question is located and where the defendants reside.

25. Any contents or question that I have not provided a response for are denied.


Jaclyn Smith



Judith Smith

Mail a copy to:
Joesf A. Horter
On November 30, 2009